

1 RENE L. VALLADARES
2 Federal Public Defender
3 State Bar No. 11479
4 KEISHA K. MATTHEWS
5 Assistant Federal Public Defender
6 411 E. Bonneville, Ste. 250
7 Las Vegas, Nevada 89101
8 (702) 388-6577/Phone
9 (702) 388-6261/Fax
10 Keisha_Matthews@fd.org

11 Attorney for Marquis Lamar Franklin

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 MARQUIS LAMAR FRANKLIN,

18 Defendant.

19 Case No. 2:17-cr-00333-APG-PAL

20 **STIPULATION TO CONTINUE
21 PRELIMINARY HEARING
22 (Second Request)**

23 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
24 United States Attorney, and Justin Washburne, Assistant United States Attorney, counsel for
25 the United States of America, and Rene L. Valladares, Federal Public Defender, and
26 Keisha K. Matthews, Assistant Federal Public Defender, counsel for Marquis Lamar Franklin,
that the Preliminary Hearing currently scheduled on September 14, 2023, be vacated and
continued to a date and time convenient to the Court, but no sooner than forty-five (45) days.

27 This Stipulation is entered into for the following reasons:

28 1. Counsel for the defendant needs more time to review the discovery and prepare
29 for the hearing.

30 2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested herein is not sought for purposes of delay, but to allow parties to negotiate.

6. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1 (d).

This is the second request for a continuance of the preliminary hearing.

DATED this 8th day of September 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ *Keisha K. Matthews*
By _____
KEISHA K. MATTHEWS
Assistant Federal Public Defender

/s/ Justin Washburne
By _____
JUSTIN WASHBURN
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
MARQUIS LAMAR FRANKLIN,
Defendant.

Case No. 2:17-cr-00333-APG-PAL

ORDER

IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for Thursday, September 14, 2023 at 3:00 p.m. be vacated and continued to Friday, November 3, 2023 at the hour of 1:00 p.m.

DATED this 12th of September 2023.

Herb Weksler

UNITED STATES MAGISTRATE JUDGE